



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

June 12, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: **Nucor Steel 107-16946-00038**

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

FNPERAM.wpd 8/21/02



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June 12, 2003

Mr. David A. Sulc
Nucor Steel
Rural Route 2, Box 311
Crawfordsville, Indiana 47933

Re: Exempt Construction and Operation Status,
107-16946-00038

Dear Mr. Sulc:

The application from Nucor Steel, received on March 21, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emission unit, to be located at County Road 400 East, Crawfordsville, Indiana, is classified as exempt from air pollution permit requirements:

One (1) diesel fuel storage tank, with a maximum capacity up to 1,000 gallons and a maximum throughput rate of 3,500 gallons per day, using submerged filling technology to control VOC emissions.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This existing source submitted their Part 70 application (T107-7172-00038) on November 14, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.



Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/YC

cc: File - Montgomery County
Montgomery County Health Department
Air Compliance - Jim Thorpe
Permit Tracking - Sara Cloe
Technical Support and Modeling - Michele Boner
Compliance Branch - Karen Nowak
Part 70 Application File - T107-7172-00038
Part 70 Reviewer - Melissa Groch

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Nucor Steel
Source Location:	County Road 400 East, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	3312
Operation Permit No.:	T107-7172-00038
Operation Permit Issuance Date:	Pending
Exemption No.:	107-16946-00038
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from Nucor Steel relating to the construction and operation of the following emission unit:

One (1) diesel fuel storage tank, with a maximum capacity up to 1,000 gallons and a maximum throughput rate of 3,500 gallons per day, using submerged filling technology to control VOC emissions.

History

On March 21, 2003, Nucor Steel submitted an application to the OAQ requesting permission to add a 1,000 gallon diesel fuel storage tank to their existing steel mill in Crawfordsville, Indiana. Since this storage tank has a capacity less than 10,500 gallons and a maximum throughput rate of 3,500 gallons per day, this unit is considered an insignificant activity as defined in 326 IAC 2-7-1(21)(G)(ii)(BB). Nucor Steel is an existing PSD major source. The source submitted their Part 70 permit application on November 14, 1996. This Part 70 permit (T107-7172-00038) is currently being drafted and has not been issued yet.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 21, 2003.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. The potential to emit of this unit was calculated using EPA's TANKS 4.0 software.

Potential To Emit of Modification Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	--
PM-10	--
SO ₂	--
VOC	0.01
CO	--
NO _x	--

HAP's	Potential To Emit (tons/year)
TOTAL	Negligible

Justification for Modification

This modification to a Part 70 major source is being performed pursuant to 326 IAC 2-1.1-3 (Exemption) because this is not a modification under the provisions of 326 IAC 2-7-10.5 (Part 70 Source Modification) and has potential to emit less than the exemption thresholds in 326 IAC 2-1.1-3(e)(1).

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Montgomery County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2,

the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD applicability.

Source Status

Existing Source PSD, Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	113
PM10	113
SO ₂	141
VOC	53
CO	604
NO _x	202

- (a) This existing source is a major stationary source because at least one of the attainment regulated pollutants is emitted at a rate of 100 tons per year, and it is in one of the 28 listed source categories.
- (b) These emissions were based on the emission inventory for Nucor Steel in 2001.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units after controls.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
The Diesel Fuel Storage Tank	-	-	-	0.01	--	--	Negligible
PSD Significant Modification Thresholds	25	15	40	40	100	40	NA

This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T107-7172-00038) application on November 14, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The proposed diesel tank has a capacity less than 40 cubic meters (10,560 gallons).

Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to this tank.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Diesel Fuel Storage Tank

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 8-4-3 (Petroleum Liquid Storage Facilities)

The proposed diesel tank has a capacity less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable to this tank.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source does not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9-1 are not applicable to this tank.

Conclusion

The construction and operation of this 1,000 gallon diesel fuel storage tank shall be subject to the conditions of the attached proposed Exemption 107-16946-00038.